UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

UNITED STATES, et al.,	
Plaintiffs,	
VS.	No: 1:23-cv-00108-LMB-JFA
GOOGLE LLC,	
Defendant.	
PROPOSED ORDER	
Upon consideration of Plaintiffs' pending motions to seal, Dkt. Nos. 592, 612, 642, 648,	
661, 667, 698, 719, as well as Defendant Google LLC's ("Google") Consolidated Response to	
Plaintiffs' Motions to Seal ("Consolidated Response"), the Court finds that (i) sufficient notice has	
been given (Dkt. No); (ii) the exhibits contain Google's confidential business information	
and trade secrets; (iii) only sealing will sufficiently protect Google from competitive harm; (iv)	
the limited sealing and redaction properly balances Google's interests as against the public's	
interest; and (v) the public's right of access, whether based on the common law right of access, or	
the First Amendment right of access, has been overcome; and it is hereby	
ORDERED that the motions to seal are GRANTED with respect to the exhibits identified	
in Google's Consolidated Response, which shall remain under seal until further order of the Court.	
ENTERED this day of _	2024.
Alexandria, Virginia	